UNITED STATES DISTRICT COURT FOR THE DISTRICT OF NEW JERSEY

CHRISTINE CONFORTI, ARATI KREIBICH, MICO LUCIDE, JOSEPH MARCHICA, KEVIN MCMILLAN, ZINOVIA SPEZAKIS, and NEW JERSEY WORKING FAMILIES ALLIANCE, INC.,

Plaintiffs,

v.

CHRISTINE GIORDANO HANLON, in her official capacity as Monmouth County Clerk, SCOTT M. COLABELLA, in his official capacity as Ocean County Clerk, PAULA SOLLAMI COVELLO, in her official capacity as Mercer County Clerk, JOHN S. HOGAN, in his official capacity as Bergen County Clerk, EDWARD P. MCGETTIGAN, in his official capacity as Atlantic County Clerk, and E. JUNIOR MALDONADO, in his official capacity as Hudson County Clerk,

Defendants.

Case No. 3:20-CV-08267-FLW-TJB

Civil Action

PROPOSED CONSENT ORDER

This matter having come before the Court pursuant to the directive of Chief Judge Freda L. Wolfson at a status conference call on February 8, 2021 for the parties to confer and agree upon a schedule for the filing of motions to dismiss the First Amended Complaint and briefing of same, and all counsel having consented to the terms of this Order and for good cause shown,

IT IS on this _____ day of _____ 2021, **ORDERED** as follows:

Defendants shall file their Motions to Dismiss the Amended Complaint on or before
 March 29, 2021.

- 2. Plaintiffs' opposition to the Motions to Dismiss shall be filed on or before May 3, 2021.
 - 3. Defendants shall file reply briefs, if any, on or before May 17, 2021.

HON. FREDA L. WOLFSON, C.J.

The undersigned hereby consent to the form and entry of this order:

BROMBERG LAW LLC

Attorneys for Plaintiffs

By: /s/ Brett M. Pugach

BRETT M. PUGACH

43 West 43rd Street, Suite 32 New York, NY 10036-7424

973-600-9148

bpugach@bromberglawllc.com

Dated: March 9, 2021

GENOVA BURNS LLC

Attorneys for Defendant Paula Sollami Covello

By: /s/ Jennifer Borek

JENNIFER BOREK 494 Broad Street

Newark, New Jersey 07102

973-533-0777

jborek@genovaburns.com

Dated March 9, 2021

BERRY SAHRADNIK KOTZAS & BENSON

Attorneys for Defendant Scott M. Colabella

By: /s/ Mathew B. Thompson

MATHEW B. THOMPSON

212 Hooper Avenue

P.O. Box 757

Toms River, New Jersey 08754

732-349-4800

mthompson@bskb-law.com

REARDON ANDERSON LLC

Attorneys for Defendant Christine Giordano Hanlon

By: <u>Erik Anderson</u>

ERIK ANDERSON 55 Gilbert Street North

Suite 2204

Tinton Falls, New Jersey 07701

732-758-8070

eanderson@reardonanderson.com

Dated: March 9, 2021 Dated March 9, 2021

ATLANTIC COUNTY DEP'T OF LAW

Attorneys for Defendant Edward P_McGettigan

By: /s/ Daniel J. Solt DANIEL J. SOLT

1333 Atlantic Avenue, 8th Floor

Atlantic City, NJ 08401-8278

609-343-2279

solt daniel@aclink.org

Dated: March 9, 2021

KAUFMAN SEMERARO & LEIBMAN, LLP

Attorneys for Defendant John S. Hogan

By: /s/ Jaime R. Placek
JAIME R. PLACEK

2 Executive Drive, Suite 530 Fort Lee, New Jersey 07024

201-947-8855

jplacek@northjerseyattorneys.com

COUNTY OF HUDSON
OFFICE OF THE COUNTY COUNSEL

Attorneys for Defendant E. Junior Maldonado

By: Daniel J. DeSalvo

DANIEL J. DESALVO

Administration Building Annex

567 Pavonia Avenue

Jersey City, New Jersey 07306

201-795-6250 ddesalvo@hcnj.us

Dated March 9, 2021

GURBIR S. GREWAL ATTORNEY GENERAL OF NEW JERSEY

Attorneys for State of New Jersey

By: /s/ George N. Cohen

GEORGE N. COHEN

R.J. Hughes Justice Complex

25 Market Street P.O. Box 112 Trenton, NJ 08625

609-376-2955

George.Cohen@law.njoag.gov

Dated: March 9, 2021 Dated: March 9, 2021